

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

Audury Petie Davis  
Plaintiff

v.

New American Funding, et al.,  
Defendants.

Civil Action NO: 1:25-CV-00690-PJC

MOTION TO AMEND COMPLAINT AND SUBSTITUTE  
PLAINTIFF

NOW COMES the undersigned, Audury Petie Davis, and respectfully moves this Honorable Court for leave to amend the Complaint Pursuant to Federal Rules of Civil Procedure 15(a)(2) and 17(a)(3), and in support thereof states as follows:

1. THE original Complaint named Maryann Butler as Plaintiff, with Petie Davis acting in the Capacity of Authorized Representative.
2. Based on the factual and evidentiary record in this matter, it is clear that Audury Petie Davis is the true Party in interest. Petie Davis;
  - Personally managed the loan application and Communication Process.

FILED  
HARRISBURG, PA

JUN 23 2025

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- Was the direct recipient of the appraisal, emails, and regulatory responses,
- Filed formal complaints with the CFPB, HUD, and BBB
- Paid for the appraisal and filing costs
- Was personally named and misrepresented in the CFPB formal response.

3. Pursuant to Rule 17(a)(3) of the Federal Rules of Civil Procedure, the Court must allow a reasonable time for substitution when an action is not brought in the name of the party in interest

4. No prejudice will result from the amendment. It will clarify the record, streamline the issues, and place the proper party before court.

5. This motion is brought in good faith to ensure accurate representation of the injured party and judicial efficiency.

Wherefore, the undersigned respectfully requests that this Court:

Grants leave to amend the Complaint,

Remove Maryann Butler from caption,

Substitute Audrey Petre Davis as sole Plaintiff

And permit the filing of an amended Complaint for MR. DAVIS.

Respectfully Submitted

*By Audury P. Davis*  
Audury Petre Davis  
2041 GREENWOOD  
HBG Pa 17104  
Plaintiff, pro-se  
June 23, 2025

### CERTIFICATE OF SERVICE

I hereby certify that on June 23, 2025 I caused a true and correct copy of the foregoing Motion to Amend Complaint and Substitute Plaintiff to be served via email on the following

James McNally Esq  
jmcnally@cohenseglia.com